

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS, DALLAS DIVISION**

RYAN LLC,	§	
Plaintiff,	§	
	§	
CHAMBER OF COMMERCE OF	§	
THE UNITED STATES OF	§	
AMERICA, BUSINESS	§	
ROUNDTABLE, TEXAS	§	
ASSOCIATION OF BUSINESS, and	§	
LONGVIEW CHAMBER OF	§	Civil Action No.: 3:24-CV-00986-E
COMMERCE,	§	
Plaintiff-Intervenors,	§	
	§	
v.	§	
	§	
FEDERAL TRADE COMMISSION,	§	
Defendant.	§	

**UNOPPOSED MOTION OF PROSPECTIVE *AMICI CURIAE* THE
AMERICAN HOSPITAL ASSOCIATION AND THE FEDERATION OF
AMERICAN HOSPITALS FOR LEAVE TO PROCEED WITHOUT
LOCAL COUNSEL**

Pursuant to Local Rule 83.10(a), *amici curiae* the American Hospital Association and the Federation of American Hospitals (together, “*Amici*”), respectfully seek leave to proceed without local counsel. This motion is unopposed.

1. *Amici* are national associations representing more than 6,000 hospitals, healthcare systems, and other healthcare organizations. Their members would be adversely impacted if the Federal Trade Commission’s Non-Compete

Clause Rule, 89 Fed. Reg. 38,342 (May 7, 2024), were to go into effect.

Therefore, *amici* intend to seek this Court's leave to file an *amicus* brief in support of Plaintiff and Plaintiff-Intervenors' challenges to the Rule.

2. *Amici* respectfully request that the Court permit *Amici* to proceed without local counsel. *Amici* seek only to file an *amicus* brief, and their motion for leave to do so will be unopposed. *Amici* are not seeking party status or the opportunity to present oral argument, and will not need to appear in person in connection with this matter. Accordingly, *Amici* expect that the Court will decide the motion on the papers and without a hearing. In light of *Amici*'s limited participation in this case, *Amici* respectfully request that the local counsel requirement be waived.

3. *Amici*'s counsel have reviewed the Local Rules for the Northern District of Texas and this Court's procedures.

4. Counsel for the Plaintiff and Plaintiff-Intervenors consent to this motion. Counsel for Defendant takes no position to this motion.

CONCLUSION

For the foregoing reasons, *Amici* respectfully submit that the Court should grant *Amici* leave to proceed without local counsel.

Respectfully submitted,

DATED: July 25, 2024

HOOPER, LUNDY & BOOKMAN, P.C.

/s/ Katrina A. Pagonis

Katrina A. Pagonis

(*pro hac vice* motion submitted)

44 Montgomery Street, Suite 3500

San Francisco, CA 94104

Email: kpagonis@hooperlundy.com

Telephone: (415) 875-8500

Fax: (415) 986-2157

Kelly A. Carroll

(*pro hac vice* motion submitted)

HOOPER, LUNDY & BOOKMAN

401 9th Street NW, Suite 550

Washington, DC 20004

Email: kcarroll@hooperlundy.com

Telephone: (202) 580-7712

Fax: (202) 609-8931

Counsel for *Amici Curiae*

CERTIFICATE OF WORD COUNT

I hereby certify that pursuant to the Court's Procedures and Standing Order, this Motion contains 272 words, excluding the case caption, signature block, and certificates, but including any footnotes, as calculated by my word processing software.

DATED: July 25, 2024

/s/ Katrina A. Pagonis

Katrina A. Pagonis

CERTIFICATE OF CONFERENCE

I hereby certify that on July 23, 2024, my office conferred with counsel for Plaintiff, counsel for Plaintiff-Intervenors, and counsel for Defendant for their position on this motion. Counsel for Plaintiff and Plaintiff-Intervenors consent to this motion. Counsel for Defendant takes no position to this motion.

Date: July 25, 2024

/s/ Katrina A. Pagonis

Katrina A. Pagonis

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2024, I electronically filed this document using the ECF System, which will send notification to the ECF counsel of record.

Date: July 25, 2024

/s/ Katrina A. Pagonis

Katrina A. Pagonis